

### REMARKS

Claims 1-18 are pending in this application. Claims 1-18 stand rejected. By this Amendment, claims 1, 2, 9, 10, and 12 have been amended. The amendments made to the claims do not alter the scope of these claims, nor have these amendments been made to define over the prior art. Rather, the amendments to the claims have been made to improve the form thereof. In light of the amendments and remarks set forth below, Applicants respectfully submit that each of the pending claims is in immediate condition for allowance.

Claims 1-14 and 16-18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,208,689 (“Ohira”). Applicants respectfully traverse this rejection.

To anticipate a claim under 35 U.S.C. § 102, the cited reference must disclose every element of the claim, as arranged in the claim, and in sufficient detail to enable one skilled in the art to make and use the anticipated subject matter. See, PPG Industries, Inc. v. Guardian Industries Corp., 75 F.3d 1558, 1566 (Fed. Cir. 1996); C.R. Bard, Inc. v. M3 Sys., Inc., 157 F.3d 1340, 1349 (Fed. Cir. 1998). A reference that does not expressly disclose all of the elements of a claimed invention cannot anticipate unless all of the undisclosed elements are inherently present in the reference. See, Continental Can Co. USA v. Monsanto Co., 942 F.2d 1264, 1268 (Fed. Cir. 1991).

Among the limitations of Applicants’ claims not shown or disclosed in Ohira is a memory access width controller that controls said quantization controller

such that the bit allocation is controlled in relation to the number of bits of a memory bus width accessing said memory. Ohira is silent as to this limitation.

In Applicants' independent claims, the storage capacity of the memory, the size of the image, as well as the memory bus that accesses the memory all affect the compression rate. According to Applicants' claims, the quantization controller is controlled by the memory access width controller which depends upon the number of bits of a memory bus that accesses the memory.

The Office Action asserts that Ohira discloses the data bus accessing the memory affecting the compression rate. Applicants respectfully disagree. The Office Action states that "Applicants attention are directed again to column 13, lines 26-32 of Ohira, et al. where Ohira, et al. teaches that the 'freshened rate judging section 106 judges a rate of decoded data 151 to be compressed and stored in the frame memory based upon the size of the image in connection with the storage capacity of the frame memory. The compression rate judging section 106 selects a compression mode from among a plurality of compression modes based upon the rate of compression.' And to column 14, lines 8-28 of Ohira, et al. for teaching that the compression judging rate section providing the rate of compression in connection with the storage capacity of the frame memory 103 with the expression  $T \times U \times R/LM \leq Z$  with Z being the number of bits within memory 103 and LM being the rate of compression and "the respective predictive/display frame memory areas 310a, 310b, 311 of the predictive/display frame memory 103 having Z bits for the storage capacity." See Office Action at 3-4.

Applicants note that nowhere in these two cited portions of Ohira, or

anywhere else, does Ohira reference the memory bus that accesses said memory as explicitly recited in Applicants' claim. Further, nothing in Ohira suggests that the rate of compression is modified depending on the memory access bus width. As such, Applicants respectfully submit that the Ohira reference fails to disclose all of the limitations in Applicants claims.

Claims 2-8 depend from, and contain all the limitations of claim 1. These dependent claims also recite additional limitations which, in combination with the limitations of claim 1, are neither disclosed nor suggested by Ohira and are also believed to be directed towards the patentable subject matter. Thus, claims 2-8 should also be allowed.

Claims 10-16 depend from, and contain all the limitations of claim 9. These dependent claims also recite additional limitations which, in combination with the limitations of claim 9, are neither disclosed nor suggested by Ohira and are also believed to be directed towards the patentable subject matter. Thus, claims 10-16 should also be allowed.

Claim 18 depends from, and contains all the limitations of claim 17. This dependent claim also recites additional limitations which, in combination with the limitations of claim 17, are neither disclosed nor suggested by Ohira and are also believed to be directed towards the patentable subject matter. Thus, claim 18 should also be allowed.

The Office Action further rejects claim 15 as being unpatentable over Ohira in view of Nakajima, U.S. Patent No. 6,243,421. Applicants respectfully traverse this rejection. Nakajima was not included to cure the deficiency discussed

above in Ohira, namely, that Ohira fails to consider the memory bus accessing said memory when designating a compression rate but to show additional limitations which, even if Nakajima were to disclose, do not cure that deficiency. As such, claim 15 is also allowable over the cited references.

Applicants have responded to all of the rejections and objections recited in the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are therefore respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

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Respectfully submitted,

By   
Ian R. Blum

Registration No.: 42,336  
DICKSTEIN SHAPIRO MORIN &  
OSHINSKY LLP  
1177 Avenue of the Americas - 41st Floor  
New York, New York 10036-2714  
(212) 835-1400  
Attorneys for Applicant

IRB/mgs